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March 6, 2023

**By ECF:**

Hon. Ronnie Abrams  
U.S. District Court, Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In re Hearst Communications State Right of Publicity Statute Cases*,  
Case No. 21-cv-08895-RA (S.D.N.Y.)

Dear Judge Abrams,

I represent the Plaintiffs in the above-referenced action. I write pursuant Rule 1.D. of Your Honor's Individual Rules of Practice in Civil Cases to respectfully request a stay of Plaintiff's deadline to oppose Defendant's motion for attorney fees (ECF Nos. 56-58). Plaintiffs' current deadline is March 9, 2023.

There have been three prior requests for extensions of time in this matter. In the first (ECF No. 40), the parties (through a letter submitted by plaintiff) each requested extensions of time for briefing related to Defendant's motion to dismiss. Your Honor granted that request (ECF No. 41). The second request was for an extension of Plaintiff's deadline to oppose Defendant's motion for attorney fees (ECF No. 59). Your Honor also granted that request (ECF No. 60). The third request was for also for a 30-day extension of this deadline (ECF No. 62), which Your Honor granted on February 7, 2023 (ECF No. 63).

As reported in their prior request for an extension, the Parties have agreed in principle to a settlement, but require additional time to finalize and execute their agreement. Accordingly, and to avoid further requests for extension, I respectfully request that the Court indefinitely stay Plaintiffs' deadline to file an opposition to Defendant's motion until either party requests that proceedings be resumed. In the alternative, I respectfully request that the Court extend Plaintiff's deadline to file an opposition to Defendant's motion for 30 days. Defendant has assented to this request.

Thank you for your time and consideration to this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Philip L. Fraietta".

Philip L. Fraietta

CC: All counsel of record (via ECF)